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Attorneys for Defendants Digital Licensing Inc., Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL

**DEFENDANTS DIGITAL LICENSING INC.,
JASON R. ANDERSON, JACOB S.
ANDERSON, SCHAD E. BRANNON,
AND ROYDON B. NELSON AND
RELIEF DEFENDANTS BUSINESS
FUNDING SOLUTIONS, LLC, BLOX
LENDING, LLC, THE GOLD
COLLECTIVE LLC, AND UIU
HOLDINGS, LLC’S MOTION FOR
LEAVE TO FILE A REPLY TO THE
SEC’S RESPONSE TO THE COURT’S
NOVEMBER 30, 2023 ORDER TO
SHOW CAUSE**

Case No. 2:23-cv-00482-RJS

EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENAJMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual;

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

Chief Judge Robert J. Shelby

**DEBT BOX DEFENDANTS’ MOTION FOR LEAVE TO FILE A REPLY TO
THE SECURITIES AND EXCHANGE COMMISSION’S RESPONSE TO
THE COURT’S NOVEMBER 30, 2023 ORDER TO SHOW CAUSE
WHY THE COURT SHOULD NOT IMPOSE SANCTIONS**

Pursuant to DUCivR 7-1(a)(9), Defendants Digital Licensing Inc. (d/b/a “DEBT Box”), Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, and Roydon B. Nelson (collectively

“DEBT Box Defendants”) and Relief Defendants Business Funding Solutions, LLC, Blox Lending, LLC, The Gold Collective LLC, and UIU Holdings, LLC (collectively “Relief Defendants”), by and through undersigned counsel, respectfully request that this Court grant leave to file a reply to Plaintiff Securities and Exchange Commission’s (“SEC”) response to the Court’s November 30, 2023 Order to Show Cause Why the Court Should Not Impose Sanctions (“OSC”) (ECF No. 233).

The DEBT Box Defendants have been most directly and adversely affected by the actions of the SEC in connection with the *ex parte* TRO in this case. The DEBT Box Defendants have not had an opportunity to provide any submission to assist the Court’s decisional process with respect to the OSC. The DEBT Box Defendants respectfully request an opportunity to do so.

If such leave request is granted, the DEBT Box Defendants would further request that the Court allow their submission, of no more than 20 pages (exclusive of any exhibits), to be filed with the Court and served on the parties by January 12, 2024 (in light of the year-end holidays).

Respectfully submitted,

Dated: December 22, 2023

KUNZLER BEAN & ADAMSON, PC

Matthew R. Lewis
Taylor J. Smith

MORRISON COHEN LLP

/s/ Richard Hong

Richard Hong (admitted *pro hac vice*)
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